



IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

Richmond Division

UNITED STATES OF AMERICA	)	
	)	
v.	)	CRIMINAL NO. 3:16-cr- <u>076</u>
	)	
CAPRI M. WILLIAMS,	)	
	)	
Defendant.	)	

CRIMINAL INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

**COUNT ONE**  
(Bank Fraud)

1. On or about February 11, 2015 through on or about March 2, 2015, in the Eastern District of Virginia and within the jurisdiction of this Court, the defendant, CAPRI M. WILLIAMS, did knowingly, unlawfully, and with intent to defraud, execute and attempt to execute a scheme and artifice to defraud and obtain moneys, funds and property owned by and under the custody and control of Citibank, a financial institution as that term is defined in Title 18, United States Code, Section 20, by means of materially false and fraudulent pretenses and promises.

**THE SCHEME AND ARTIFICE TO DEFRAUD**

2. The scheme and artifice to defraud operated in substance as follows:
- a. WILLIAMS was employed as a licensed practical nurse with Commonwealth Primary Care, Inc. at all times relevant to this Criminal Information.
  - b. In her capacity as a licensed practical nurse with Commonwealth Primary Care, Inc., WILLIAMS had access to the personal identifying information of patients at Commonwealth Primary Care, Inc.

c. WILLIAMS accessed the personal identifying information of hundreds of patients at Commonwealth Primary Care, Inc.

d. WILLIAMS then used and attempted to use the personal identifying information to impersonate several patients and open new financial accounts and lines of credit without the knowledge or consent of the person whose information was used to open the account.

3. To execute the scheme and artifice to defraud, defendant CAPRI M. WILLIAMS committed or caused the commission of the following acts, among others, in the Eastern District of Virginia:

a. On or about February 11, 2015, WILLIAMS accessed the personal identifying information of B.S., a patient of Commonwealth Primary Care, Inc.

b. On or about February 11, 2015, WILLIAMS used B.S.'s personal identifying information to open a credit card account (account number ending in 3914) at Citibank without B.S.'s knowledge or permission.

c. Between on or about February 11, 2015, and on or about March 2, 2015, WILLIAMS used that Citibank credit card account opened in B.S.'s name to make a balance transfer in the amount of \$4,500 to CAPRI WILLIAMS.

d. Citibank issued that balance transfer check and mailed it to a Post Office Box used by WILLIAMS. Associated with that balance transfer was a fee of \$135.00.

e. B.S. did not have knowledge of or consent to this balance transfer.

(In violation of Title 18, United States Code, Section 1344).

**COUNT TWO**  
(Aggravated Identity Theft)

On or about February 11, 2015, in the Eastern District of Virginia and within the jurisdiction of this Court, defendant CAPRI M. WILLIAMS did knowingly and unlawfully possess and use, without lawful authority, a means of identification of another person (that is the name, date of birth, and Social Security number of B.S.) during and in relation to a felony violation contained in Chapter 63 of the United States Code (that is, Bank Fraud, in violation of Title 18, United States Code, Section 1344 as charged in Count One of this Criminal Information).

(In violation of Title 18, United States Code, Section 1028A(a)(1).)

**CRIMINAL FORFEITURE ALLEGATION**

Pursuant to Rule 32.2(a) FED. R. CRIM. P., the defendant is hereby notified that, if convicted of the offense alleged in Count One of this Criminal Information, the defendant shall forfeit to the United States her interest in any property constituting, or derived from, proceeds obtained directly or indirectly as the result of such violation, including, but not limited to, the sum of at least **\$34,906.15** and any assets which may be directly forfeitable as proceeds or subject to forfeiture as a substitute asset.

(In accordance with Title 18, United States Code, Section 982(a)(2), and Title 18, United States Code, Section 981(a)(1)(C), as incorporated by 28 U.S.C. § 2461(c).)

Dana J. Boente  
United States Attorney

By: Heather L. Hart  
Heather L. Hart  
Assistant United States Attorney